

REMARKS

Reconsideration of the pending application is respectfully requested on the basis of the following particulars:

1. Amendments and Support for Same

By the Response, claims 16-18 have been amended to correct minor topographical errors and to improve the clarity of the claim language. No new matter has been added. Accordingly, claims 1-22 are pending, of which claims 1 and 16 are independent. Approval and entry of the amendments are respectfully requested.

2. Information Disclosure Statement

With regard to the examiner's encouragement to submit pertinent references in an IDS, Applicant respectfully submits that Applicant is fully aware of the duty to disclose, and that Applicant has no pertinent references to submit at this time.

3. Claim rejections under 35 U.S.C. §112, 2<sup>nd</sup> paragraph

With respect to the rejection of claims 16-22 under 35 U.S.C. §112, 2<sup>nd</sup> paragraph, Applicant has amended claim 16 to correct minor typographical errors, particularly to change "information data" to "information code" and "translated date" to "translated data." In view of the amendments set forth above, Applicant respectfully requests reconsideration and withdrawal of the §112, 2<sup>nd</sup> paragraph, rejections of claims 16-22.

Further, Applicant has amended claims 16-18 to change "means for translating" to "translator configured to translate."

4. Rejection under 35 U.S.C. §102(b)

With respect to the rejection of claims 1-5, 8-10, 13-14, and 16-20 under 35 U.S.C. §102(b) as being anticipated by Takatsuda (US 2002/0119810), Applicant respectfully traverses the rejection at least for the reason that Takatsuda fails describe each and every limitation recited in the rejected claims.

Claim 1 of the present invention is directed to method for translating an information code of a video game. The method includes the steps of:

(a) receiving an audio/video signal from the video game, wherein the audio/video signal contains the information code interpreted in an original language to be output on a display device;

(b) pre-storing the audio/video signal in a memory module;

(c) extracting the information code from the audio/video signal in the memory module;

(d) translating the information code from the original language into a selected language to form a translated data;

(e) introducing the translated data back into said audio/video signal in the memory module; and

(f) outputting the audio/video signal with the translated data at the display device, in such a manner that a player of the video game is able to understand the translated data while the player is familiar with the selected language of the translated data.

As discussed in the paragraph bridging pages 1 and 2 of the specification, there are video games manufactured and sold to players without an option for selecting a foreign language output for players in another country who may understand the language that the game utilizes. Hence, Applicant's claimed invention provides a solution for video games, for example, that are limited to providing text and/or speech output in one language or in a language that a player cannot understand. That is, the presently claimed invention extracts information from a game's audio/video output and translates information from a first language to a selected language. The presently claimed invention also introduces the translated information back into a memory module from which the information was extracted so that audio/video signals with translated data understandable by a user is outputted on a display device.

Takatsuda, on the other hand, describes an option to select a foreign language in a game. Paragraph [0080] of Takatsuda states:

[0080] Thereafter in step S102, the entertainment device 12 edits the sentence information according to the set conversation language, to thereby generate conversation information. For the case a foreign language is selected, such editing includes translation. For the case Japanese is selected, the editing includes modification of the inflection or the like specific to the selected dialect.

Although the word “translation” is used in paragraph [0080] of Takatsuda, Applicant respectfully asserts that Takatsuda is completely silent at least regarding a step of extracting and translating information as recited in claim 1 of the present invention. Rather, when reading the word “translation” in proper context, Takatsuda merely includes an option for selecting a foreign language and displays stored translation of a language. Takatsuda, however, does not disclose any act of translating.

Applicant respectfully asserts that the examiner has failed to consider the prior art in its entirety as set forth in MPEP 2141.02(VI), and that the application of Takatsuda in the rejection is further improper.

Consequently, since each and every feature of the present claims is not taught (and is not inherent) in Kobayashi, as is required by MPEP Chapter 2131 in order to establish anticipation, the rejection of claims 1-5, 8-10, 13-14, and 16-20, under 35 U.S.C. §102(b), as anticipated by Takatsuda is improper.

The arguments set forth above in relation to independent method claim 1 are also applicable to the rejection of independent system claim 16.

In view of the arguments set forth above, Applicant respectfully requests reconsideration and withdrawal of the §102(b) rejection of claims 1-5, 8-10, 13-14, and 16-20.

5. Rejections under 35 U.S.C. §103(a)

With respect to the rejection of dependent claims 6-7, 11-12, 15, and 21-22 under 35 U.S.C. §103(a) as being unpatentable over Takatsuda and Oakes (US 7,025,678), Applicant respectfully traverses the rejection at least for the reasons set forth above in relation to the §102(b) rejection of independent claims 1 and 16 over Takatsuda, and further for the reason that Takatsuda and Oakes, combined or

separately, fail to teach, disclose, or suggest all of the features recited in the rejected dependent claims.

With respect to Oakes, although the reference describes analog to digital converters (ADCs 342, 346, 442, and 336), the ADCs of Oakes are for inputting and outputting video and audio signals to a remote unit or a display. Oakes, however, is silent regarding converting audio/video signal into a digital form into a memory module from which information code was extracted from the memory module, as recited in claim 6, for example.

In other words, Oakes describes ADC units for converting audio/video signals for displaying or for a remote unit, while Applicant's claimed invention converts audio/video signal for language translation (i.e., as recited in step (d)), wherein the converted signal is then introduced back into the memory module, as recited in step (e) in claim 1.

The requirements for establishing a *prima facie* case of obviousness, as detailed in MPEP § 2143 - 2143.03 (pages 2100-122 - 2100-136), are: first, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference to combine the teachings; second, there must be a reasonable expectation of success; and, finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations.

Moreover, according to MPEP §2141(II), when applying 35 U.S.C. 103, the following tenets of patent law must be adhered to:

- (A) The claimed invention must be considered as a whole;
- (B) The references must be considered as a whole and must suggest the desirability and thus the obviousness of making the combination;
- (C) The references must be viewed without the benefit of impermissible hindsight vision afforded by the claimed invention; and
- (D) Reasonable expectation of success is the standard with which obviousness is determined.

As Takatsuda and Oakes, combined or separately, fail to teach, disclose, or suggest all of the claimed features, as discussed above, and as Takatsuda and Oakes lack the desirability to combine their different teachings to arrive at Applicant's claimed invention with reasonable expectation of success, the reliance on Takatsuda and Oakes in the obviousness rejection of claims 6-7, 11-12, 15, and 21-22 is improper.

In view of the amendment and arguments set forth above, Applicant respectfully requests reconsideration and withdrawal of the §103(a) rejection of claims 6-7, 11-12, 15, and 21-22 over Takatsuda and Oakes.

6. Conclusion

In view of the amendments to the claims, and in further view of the foregoing remarks, it is respectfully submitted that the application is in condition for allowance. Accordingly, it is requested that claims 1-22 be allowed and the application be passed to issue.

If any issues remain that may be resolved by a telephone or facsimile communication with the Applicant's attorney, the Examiner is invited to contact the undersigned at the numbers shown.

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Respectfully submitted,



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